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June 14, 2024

Via ECF

Hon. Jessica G. L. Clarke
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
Courtroom 11B
New York, NY 10007-1312

Re: United States v. Anton Peraire-Bueno and James Peraire-Bueno, Case No. 1:24-cr-00293; Consent Motion for Temporary Modification of Bond Condition

Dear Judge Clarke:

With the consent of Pretrial Services and the government, Defendants James Peraire-Bueno (“James”) and Anton Peraire-Bueno (“Anton”) respectfully request a temporary modification of their bond conditions for the purpose of liquidating securities in order to pay for counsel in this matter and living expenses. Both James and Anton have as conditions of their release a prohibition on trading cryptocurrency or securities. Dkts. 8, 20. Because their unfrozen assets are largely held in investment accounts, certain of those assets need to be traded in order to be utilized to pay for their legal representation in this case. Accordingly, James and Anton request a temporary modification of the prohibition on trading to permit them to take all necessary steps, within 7 days from an order allowing this request, to liquidate the following accounts:

Name	Bank	Account number
James Peraire-Bueno	Chase	X8002
Anton Peraire-Bueno	Chase	X4005
Anton Peraire-Bueno	Chase	X6240
Anton Peraire-Bueno	Fidelity	X2997

The government consents to this requested modification. Pre-trial services does not object to this requested modification.

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Sincerely,

/s/ Katherine Trefz

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